

## REMARKS

### Claim Status:

Claims 1-12, 14-25 and 27-57 are pending in the present application. Claims 21-24 and 30-51 remain withdrawn from consideration. Claims 12 and 25 are amended herein without prejudice.

### Formal Rejections

Claim 25 is amended without prejudice to recite “to verify an age level *associated with the document*”. We respectfully request that §112 rejection be removed.

### Art-Based Rejection

Claims 1-12 and 14-20, 27-29 and 52-57 are rejected as being unpatentable over Wu (U.S. Patent No. 6,748,533) in view of Moskowitz (U.S. Patent No. 7,159,116).

We respectfully traverse these rejections.

*Claim 27 in view of Wu and Moskowitz.*

Claim 27 recites *storing the data* corresponding to the second field in a data repository *to evidence examination of the identification document*.

Wu is cited at Col 7, lines 35-37 and Col. 4, lines 48-55 to anticipate these features. See the Office Action, page 17, lines 12-14.

We disagree.

For example, Col 4 discusses verifying the legitimacy of an article against forgery. And the Col. 7 passage discusses what kind of articles can be protected against forgery (e.g., a credit card, driver’s license, etc.).

Neither of the cited passages, however, discusses *storing data to evidence examination of the identification document*.

Claim 27 should be allowed since Wu does not have each and every feature of as recited therein, and Moskowitz is not cited to cure any of Wu’s deficiencies.

(The Office Action further states that Claim 27 is rejected due to its dependence on claim 25. See the Office Action, page 4, line 9. This type of rejection cuts across well

established examination policy, requiring the features of each claim to be independently analyzed.)

*Claims 14 and 15 in view of Wu and Moskowitz.*

Claim 14 recites a second set of information embedded in the identification document of claim 12. The second set of information corresponds to a third set of information that is printed on the identification document. The second set of information comprises an *index for accessing a data repository*.

Regarding the features of claim 14, Wu at Col. 7, line 53 – Col. 8, line 3, is cited in the Office Action (see page 13, lines 12-16).

The cited Wu passage, however, discusses storing different information (i.e., identification portion, name of country or state, photograph, passport number, name of person, issuance information, personal particulars and biometric data) and does not mention a second set of information comprising an *index for accessing a data repository*.

Claim 14 should be allowed since Wu does not have each and every feature of as recited therein, and Moskowitz is not cited to cure any of Wu's deficiencies.

Claim 15 recites that the *index comprises a hash* of the third set of information that is printed on the identification document. (Recall from claim 14 that the index is for accessing a data repository.) The cited Wu passage (col. 8, lines 22-30; see the Office Action, page 13, lines 17-19) discusses encrypting a biometric invariant feature with a hash. But this hash is not an index for accessing a data repository.

Claim 15 should be allowed since Wu does not have each and every feature of as recited therein, and Moskowitz is not cited to cure any of Wu's deficiencies.

*Claim 18 in view of Wu and Moskowitz.*

Claim 18 recites a first set of information comprises two or more random bits. The Office Action refers to the "generate random pattern" step of Wu's Fig. 6 as teaching these features. See the Office Action, page 14, lines 9-11.

We respectfully disagree.

Claim 18's "first set of information" is like a message, and if mapped to Wu's Fig. 6 would be more like the biometric information 600 or the other appending information 602. Information 600 and 602 are encrypted and provided to a random pattern generator. But, as a result, the biometric information 600 and the other appending information 602 does not then include "two or more random bits". We submit that the random pattern is more akin to a watermark carrier signal, and not to an actual message.

Thus, Wu is not understood to teach or suggest adding two or more random bits to a first set of information.

Claim 18 should be allowed since Wu does not have each and every feature of as recited therein, and Moskowitz is not cited to cure any of Wu's deficiencies.

*Claim 20 in view of Wu and Moskowitz.*

Claim 20 recites – in combination with other features – that a combination of random bits and the date of birth decrease likelihood of overlapping birth dates, while maintaining an anonymous audit clue.

We see no mention of "maintaining an anonymous audit clue," in combination with the other claim features, in the cited passages (see the Office Action, page 14, lines 14-17, citing Wu at col. 11, lines 15-18 and Fig. 6).

Indeed, the cited Wu passage at col. 11, lines 15-18 (and fig. 6), says nothing regarding maintaining an anonymous audit clue, in combination with the other claim features.

Claim 20 should be allowed since Wu does not have each and every feature of as recited therein, and Moskowitz is not cited to cure any of Wu's deficiencies.

*Claim 1 in view of Wu and Moskowitz.*

Claim 1 recites – in combination with other features – ***verifying a bearer's age when:*** i) the first digital data indicates that the bearer is at least as old as a predetermined age, **and** ii) the second digital data and the third digital data correspond.

Both conditions i and ii must be satisfied in order to *verify a bearer's age*.

Wu at Col. 7, lines 20-28 (see Office Action, page 6, lines 7-9) mentions the term “Birth date” (line 21) but says nothing of verifying a bearer’s age when first digital data indicates that the bearer is at least as old as a predetermined age.

And while Wu at Col. 5, lines 14-33 and Col. 9, lines 1-22 (see Office Action, page 6, lines 7-9) may discuss verifying the legitimacy of an article, neither passage discusses *verify a bearer’s age* when second digital data and the third digital data correspond.

Therefore, even if combined as suggested, Wu and Moskowitz would not provide a method or system to verify a bearer’s age when: i) the first digital data indicates that the bearer is at least as old as a predetermined age, and ii) the second digital data and the third digital data correspond.

Claim 1 stands ready for allowance.

*Claim 25 in view of Wu and Moskowitz.*

Amended claim 25 recites – in combination with other features – comparing data corresponding to the second field with the reduced-bit representation to verify an age level associated with the document *in connection with an age-related transaction or event*. Neither the data corresponding to the second field nor the reduced-bit representation betray the identity of the bearer of the identification *document to said multi-purpose electronic processor or an entity performing said act of comparing*.

In connection with claim 1, the Office Action stated that Wu protects a person’s anonymity by encrypting data to protect the owner from unauthorized people. See the Office Action, page 7, lines 11-15.

Surely, however, the *intended* receiving party would need to decrypt the data, which could betray the identity of the document bearer. Thus, Wu lacks the claim feature of not betraying the identity of the bearer of the identification *document to the multi-purpose electronic processor or an entity performing said act of comparing*, as recited in claim 25.

It is also worth noting the Office Action’s discussion on page 7, lines 15-20, which alleges that Moskowitz discloses protecting a person’s anonymity. Moskowitz is cited at Col. 20, line 60 and Col. 38, lines 3-8, for these features.

Moskowitz at Col. 38, lines 3-8, discuss “anonymous authentication” for a product, medicine or label. In response, an authentication device may display known warnings or recommended dosages regarding the “**item**” in question. There is no discussion there of verifying an age level associated with a document *in connection with an age-related transaction or event*.

When dealing with verifying the identity of an individual, Moskowitz requires additional “identity” verification. See Moskowitz at Col. 38, lines 16-22.

Thus, even if combined as proposed in the Office Action, Wu and Moskowitz would not render obvious claim 25’s features – in combination with other features – of comparing data corresponding to the second field with the reduced-bit representation to verify an age level associated with the document *in connection with an age-related transaction or event*. Neither the data corresponding to the second field nor the reduced-bit representation betray the identity of the bearer of the identification *document to said multi-purpose electronic processor or an entity performing said act of comparing*.

Withdrawal of the rejection is requested.

*Claim 12 in view of Wu and Moskowitz.*

Amended claim 12 recites – in combination with other features – determining, based on the first set of information, the person’s age or age level *in connection with an age-related transaction or event*, wherein said act of determining protects the anonymity of the person in possession of the identification document *from said multi-purpose electronic processor or entity performing said determining*.

The Wu document is cited at col. 7, lines 20-28 and Col. 7, line 65 – Col. 8, line 3 as meeting the act of determining. See the Office Action at page 11, lines 3-5. These passages envision information pertaining to the person’s identify (e.g., person’s fingerprint and ID number). But, surely, this does not *protect the anonymity of the person in possession of the identification document* as recited in claim 12.

The Office Action further stated that Wu protects a person’s anonymity by encrypting data to protect the owner from unauthorized people. See the Office Action, page 12, lines 7-12.

Surely, however, the *intended* receiving party would need to decrypt the data, which could betray the identity of the document bearer. Thus, Wu lacks the claim feature of protecting the anonymity of the person in possession of the identification document from the multi-purpose electronic processor or entity performing the determining.

It is also worth noting the Office Action's discussion on page 12, lines 15-16, which alleges that Moskowitz discloses protecting a person's anonymity. Moskowitz is cited at Col. 20, line 60 and Col. 38, lines 3-8, for these features.

Moskowitz at Col. 38, lines 3-8, discuss "anonymous authentication" for a product, medicine or label. In response, an authentication device may display known warnings or recommended dosages regarding the "**item**" in question. There is no discussion there of verifying an age level associated with a document *in connection with an age-related transaction or event*.

When dealing with verifying the identity of an individual, Moskowitz requires additional "identity" verification. See Moskowitz at Col. 38, lines 16-22.

Thus, even if combined as proposed in the Office Action, Wu and Moskowitz would not render obvious claim 12' features – in combination with other features – of determining, based on the first set of information, the person's age or age level *in connection with an age-related transaction or event*, wherein said act of determining protects the anonymity of the person in possession of the identification document *from said multi-purpose electronic processor or entity performing said determining*.

Claim 12 stands ready for allowance.

#### *Remaining Claims*

We respectfully request reconsideration of the remaining claims too.

Conclusion

We respectfully a Notice of Allowance. In the meantime, the Examiner is invited to telephone the undersigned at 503-469-4685 with any remaining questions.

Date: October 6, 2009

Respectfully submitted,

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